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UNITED STATES OF AMERICA

SEALED
BY ORDER OF THE COURT

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

DEC 27 2002

10 o'clock and 59 min. M.
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
FABIAN VERECE, (01))
MARTIN VERECE, (02))
WHITEY CHEN, (03))
a.k.a. "Johnny Ray,")
)
Defendants.)
_____)

CR. NO. C R 0 2 0 0 5 5 3 HG
INDICTMENT

[21 U.S.C. §§ 846 and
841(a); 18 U.S.C. § 2]

INDICTMENT

COUNT 1

The Grand Jury charges:

Beginning from a date unknown, but by October 3,
2002 to and including November 20, 2002 in the District of
Hawaii and elsewhere, FABIAN VERECE, MARTIN VERECE, WHITEY
CHEN, a.k.a. "Johnny Ray," conspired together and with

ATTEST: A True Copy
WALTER A. Y. H. CHINN
Clerk, United States District
Court, District of Hawaii

By Barbara J. Mada
Deputy

others known and unknown to knowingly and intentionally distribute and to possess with the intent to distribute, 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a) and 841(b) (1) (A) .

WAYS AND MEANS OF CONSPIRACY

1. WHITEY CHEN, a.k.a. "Johnny Ray," obtains pound quantities of methamphetamine and sends them to Hawaii via courier or post.

2. FABIAN VERECE orders methamphetamine from WHITEY CHEN, a.k.a. "Johnny Ray," and coordinates the payment for, and delivery of, methamphetamine.

3. MARTIN VERECE assists FABIAN VERECE in the payment for, and re-distribution of, methamphetamine.

OVERT ACTS

1. On November 11, 2002, MARTIN VERECE informed FABIAN VERECE that he had some money for him.

2. Shortly before, but on or about November 19, 2002, WHITEY CHEN, a.k.a. "Johnny Ray," arranged to send approximately two pounds of methamphetamine to FABIAN VERECE via Federal Express.

3. On November 19, 2002, WHITEY CHEN, a.k.a. "Johnny Ray," telephoned FABIAN VERECE with information

regarding the approximate two pounds of methamphetamine contained within the Federal Express parcel.

4. On November 20, 2002, FABIAN VERECE accepted the Federal Express parcel which had previously contained approximately two pounds of methamphetamine.

All in violation of Title 21, United States Code, Sections 846, 841(a) and 841(b)(1)(A).

COUNT 2

The Grand Jury further charges:

Beginning from a date unknown, but by November 20, 2002, in the District of Hawaii, WHITEY CHEN, a.k.a. "Johnny Ray," knowingly and intentionally distributed 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a) and 841(b)(1)(A).

COUNT 3

The Grand Jury further charges:

Beginning from a date unknown, but by November 20, 2002, in the District of Hawaii, FABIAN VERECE and MARTIN VERECE knowingly and intentionally attempted to possess with the intent to distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 846, 841(a) and 841(b)(1)(A) and Title 18, United States Code Section 2.

COUNT 4

The Grand Jury further charges:

On or about December 28, 2001, in the District of Hawaii, FABIAN VERECE knowingly and intentionally distributed 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, to wit, 48.6 grams of actual methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a) and 841(b)(1)(B).


DATED: December 27, 2002, at Honolulu, Hawaii.

A TRUE BILL

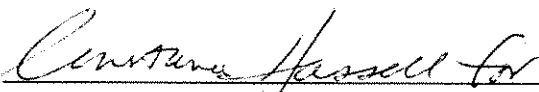
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FOREPERSON, GRAND JURY

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